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June 28, 2002

27-19071.001

BROWN AND
CALDWELL

Mr. Donald Webster
USEPA Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Interim Measures Progress Report – June 2002
Grenada Manufacturing, LLC. – Grenada, Mississippi
EPA ID No. MSD 007 037 278

Dear Mr. Webster:

This letter serves as the Interim Measures Progress Report for June 2002 for the referenced site. The United States Environmental Protection Agency (USEPA) has requested that Grenada Manufacturing transmit such progress reports in June and December until such time that a Corrective Measures Study (CMS) Report is completed for the site. Several Interim Measures have been completed or are in progress at the site. The status of these various interim measures is briefly addressed below.

RFI Report

Responses to USEPA comments dated November 26, 2001 to the RCRA Facility Investigation (RFI) Report were transmitted to the USEPA and Mississippi Department of Environmental Quality (MDEQ) in a letter dated May 9, 2002. These comments revolved around the Wet Well (SWMU 12) and the potential for vapor intrusion into the main manufacturing building from the groundwater plume beneath it. The vapor intrusion issue is being addressed separately (at the suggestion of the USEPA).

Vapor Intrusion Assessment

A preliminary vapor intrusion assessment was submitted on February 26, 2002. Comments were received in a letter dated June 14, 2002. The comments request that a work plan for indoor air monitoring be prepared for the site. This work plan will be submitted in accordance with the schedule proposed by USEPA (August 1, 2002).

Docket Number 450910

NAPL Recovery Efforts

Recovery of both light non-aqueous phase liquids (LNAPL) from Area of Concern (AOC) B (Former toluene UST area) and dense non-aqueous phase liquids (DNAPL) from AOC A (former TCE storage area) continues at the site. The NAPL recovery from wells located near the eastern outside wall of the manufacturing building at the site continues on a monthly basis. In addition, MW-2 located near the sludge lagoon has been added to the NAPL recovery program. NAPL recovery has been performed by Ferguson Harbour, Inc. under contract to ArvinMeritor. These recovery efforts will continue as an Interim Measure until such time that recovery becomes impracticable and/or some other source control measure is implemented in these areas.

Chrome Destruct Pit (SWMU 14) Closure

Closure activities in accordance with the approved work plan have been completed. Closure activities completed include the following:

- Residual chromic acid solution from the plating equipment and Chrome Destruct Pit has been removed and transported to an off-site disposal facility.
- Process equipment was cleaned and removed.
- Cleaning and confirmation sampling of the Chrome Destruct Pit was completed after the process equipment was cleaned and removed.

The USEPA issued an approval letter of clean closure for the unit dated April 4, 2002. The letter specified that no further action is required for SWMU 14. SWMU 14 was subsequently filled and capped with concrete.

As a result of the closure activities for the chromium plating operations, Grenada Manufacturing identified another SWMU and the USEPA has identified it as the Chrome Plating Area, SWMU 27, in its letter to Grenada Manufacturing dated April 4, 2002. The USEPA has requested that Grenada Manufacturing provide the dates of operation of the Chrome Plating Area, a description of the hazardous wastes or constituents formerly managed at the area, and a physical description of the unit and its condition. The SWMU 27 Work Plan and Assessment are due to the USEPA by July 25, 2002.

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Groundwater Interim Measure

Progress was made toward the implementation of a groundwater Interim Measure consisting of the installation of a permeable reactive barrier (PRB). The USEPA issued additional comments on the Design Basis Report in a letter dated November 14, 2001. A response to these comments was submitted to USEPA and MDEQ on May 9, 2002.

The PRB was tentatively scheduled for installation in the summer of 2002. However, issues surrounding the potential presence of wetlands and floodplain in the proposed location of the PRB, the need to obtain additional approvals, and the need to perform an additional treatability study have delayed the installation. Additionally, a literature survey for threatened and endangered species has been completed. The results were presented in a letter to John Bozick of ArvinMeritor dated May 9, 2002. Both the USEPA and the MDEQ were copied on this letter. The USEPA emailed comments on the literature survey to Don Williams of Grenada Manufacturing on June 5, 2002. The comments requested that a one-day field survey be conducted to verify the findings of the threatened and endangered species literature survey. As requested by the USEPA, this field survey will be addressed in the CMS Work Plan (see below).

A wetlands delineation for the site is currently being finalized. The field work for this effort has been completed and a draft report has been prepared for internal review. A wetlands delineation report will be transmitted to the appropriate regulatory agencies (including the Corps of Engineers) for approval. The groundwater Interim Measure will be implemented as soon as practicable in order to protect the local groundwater and prevent offsite migration of contaminants into Riverdale Creek.

Additional design data have recently been collected to assess the various design criteria for the PRB. Specifically, a second bench-scale treatability study was performed in 2002 on site groundwater and alternate concentration limits (ACLs) are being evaluated as target cleanup levels in lieu of MCLs. In June 2002, a limited supplemental geotechnical investigation was performed to collect additional soil data on an apparent weak soil layer that exists along the proposed PRB alignment.

Once the information described above is assimilated, the technical specifications for the PRB installation will be completed and transmitted to the agencies for review and approval. If necessary, the design drawings submitted as part of the Design Basis Report will be revised to reflect new information. Lastly, other related documents are nearing completion and will be transmitted to the USEPA and MDEQ for review along with the technical specifications. These documents include the

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Construction Quality Assurance Plan (CQAP), a Performance Monitoring Plan, and a preliminary construction schedule. These documents will be transmitted to the agencies as soon as they are completed.

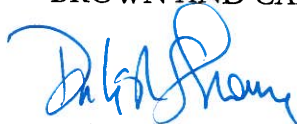
Corrective Measures Study (CMS)

In its letter dated November 26, 2001 the USEPA stated that a CMS Work Plan for the site is due by June 30, 2002. The CMS Work Plan has been completed and was transmitted to the USEPA by the June 30, 2002 deadline.

I trust that this letter provides you with the necessary information regarding the status of activities at the Grenada Manufacturing site. Please feel free to call me at (615) 250-1241 if you have any questions.

Sincerely,

BROWN AND CALDWELL



Dale R. Showers, P.E.
Project Manager
Design & Solid Waste



Robert E. Ash IV, P.E.
Department Manager
Design & Solid Waste

cc: John Bozick, ArvinMeritor
Don Williams, Grenada Manufacturing, LLC.